

PSJ3

Exhibit 297

From: Harper, Karen
To: Harper, Karen
Sent: 1/21/2011 6:40:00 PM
Subject: Draft - Suspicious Order Monitoring - Subteam 1 - Direct Order Monitoring Meeting Notes and Recommendations

Cc: Carol Svej, Tiffany Rowley-Kilper, Susan Moore

REDACTED

Since 11/09

Algorithms tweaked, current report has been in existence since May, 2010

Based upon the number of orders that appear on the report and the time required for internal review, order processing and shipment proceeds independent of the review

No order has been found retroactively to be elevated from Peculiar to Suspicious

Given that the Peculiar Order Report monitors direct orders shipment to distributors, ultimate destination of the material is not known

Approximately ½ of the Distributor orders that appear on the Peculiar Order Report are shipments to the Big 3 (McKesson, Amerisource Bergen, Cardinal)

A significant amount of orders that appear on the Peculiar Order Report are shipments to large retail chains CVS, Walgreens, WalMart

Some orders that appear on the Peculiar Order Report are not for "drugs of concern" rather shipments for Methylphenidate, Addiction Therapy Drugs, Compounding Powders

Immediate Recommendations

Longer Term Recommendations for Further Review

Print Peculiar Order Report 1X per day instead of 2X

Change algorithm to capture orders that have been shipped versus orders pending shipment (many orders are ultimately not shipped due to ODI/Order Data Integrity hold -----

Review the ODI/Order Data Integrity hold process (screens at an order-by-order level versus checking for patterns over time?)

Existing algorithm aggregates Peculiar Orders at the molecule level and further details which skus within the molecule have been ordered, yet does not detail which sku (if any) triggered the flag

Karen Harper
Mallinckrodt/Covidien Pharmaceuticals
Senior Manager, Controlled Substance Compliance
Global Logistics Group
office phone (314) 654-1868
cellular (314) 401-1573

This information may be confidential and/or privileged. Use of this information by anyone other than the intended recipient is prohibited. If you receive this in error, please inform the sender and remove any record of this message.

Subteam 1: Direct Order Monitoring

Subteam Mission:

Review existing Peculiar Order Monitoring daily report and methods of evaluation

Continue to work IS improvements (ASRs have been initiated)

Transition daily report review to Trade Relations

Team Members:

Jim Rausch
Carol Svejkosky
Susan Moore
Karen Harper